

REMARKS

This Response is submitted on April 23, 2006. Claims 1-19, 21-23, and 25-37 were rejected under 35 USC § 103(a) as being unpatentable over U.S. Patent No. 6,385,586 by Dietz in view of U.S. Patent No. 6,901,360 by Dymetman et al. Claims 1-19, 21-23, and 25-37 are pending after entry of the present Response. Reconsideration is respectfully requested.

Rejections under 35 U.S.C. § 103(a)

Applicant respectfully requests the Office to reconsider the remainder of Applicant's arguments made in the Response filed on November 20, 2006. While the Final Office Action included a response to some of Applicant's arguments, Applicant's Response filed on November 20, 2006 included additional arguments that remain unaddressed.

One of Applicant's arguments that remains unaddressed is that even assuming there was motivation to combine the references, doing so would be contradictory to MPEP 2143.01 VI. MPEP 2143.01 VI states, "If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious." As previously stated, Dietz discloses the handling of audio output, "Outputting in audio form requires a text-to-voice application 211 which converts the desired language text into an audio output *for sending to I/O device 210*." (Column 6, Lines 4-7). Dietz, even in light of Dymetman, is principally concerned with outputting language translation from the *first computer, I/O device 210*. Therefore, the Examiners proposed combination of Dietz and Dymetman to produce audible sound output from the *second computer*, would *change the principle of operation of Dietz*. Where the Office wishes to produce audible sound from Dietz's *second computer*, Dietz explicitly states that audible sound data is to be sent to the

I/O device, or first computer. Thus, Applicant's assert, and the Office has failed to rebut, that the proposed combination of Dietz and Dymetman would change the principle of operation of the Dietz, resulting in the combination of Dietz and Dymetman insufficient to render the claimed invention *prima facie* obvious.


Another unaddressed argument is Applicant's assertion of the difference between the claimed "an expression to be applied to the content data", and "expression" as used in Dymetman. Dymetman states, "The first expression 111 comprises a plurality of words in the first language." (Column 9, Lines 32-33). Dymetman further explains that, "From the second plurality of representation 171, 172 and 173 one or more appropriate representations may be selected to obtain the second expression 181 in the second language." (Column 10, Lines 9-12). Thus, Dymetman is using "expression" to define sentences and Dymetman's "expression" at best, may be considered analogous to Applicant's "content data". As such, for Dymetman to teach *applying an expression* to the content data would be nonsensical because it could be interpreted as teaching applying content data to the content data.

Additionally, Applicant respectfully disagree with The Office's statement that Applicant's arguments failed to comply with 37 CFR 1.111(c). As Applicant's Response dated November 20, 2006 did not contain amendments, the Response was not required to comply with 37 CFR 1.111(c) because 37 CFR 1.111(c) states, "In *amending* in reply to a rejection of claims in an application..."

Although Applicant has amended the claims to cover a specific embodiment with a negative limitation excluding language translation and made arguments specific to the claimed invention, the limitations and arguments are specific to this application and should not be considered limiting to any continuation application. Applicant reserves the right to file a continuation application with claims directed to other aspects disclosed in the specification of the present application, at a later time, if so desired.

In view of the foregoing arguments in the present Response, Applicant believes the application is now in a condition for allowance. Therefore, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Response, the Examiner is kindly requested to contact the undersigned at (408) 774-6903. If any other fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805. (Order No. SONYP009). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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